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February 22, 1993

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

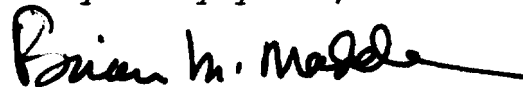
Ms. Donna R. Searcy  
Secretary  
Room 222  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Ms. Searcy:

On behalf of Zephyr Broadcasting Inc., licensee of Station WZNL(FM), Norway, Michigan, there is transmitted herewith an original and four copies of its Petition for Rule Making requesting the substitution of Channel 232C3 at Norway, Michigan in lieu of Channel 232A and the modification of the license of Station WZNL to specify operation on the higher class channel.

If any additional information is desired in connection with this matter, please contact the undersigned counsel.

Very truly yours,



Brian M. Madden

Enclosure  
BMM/tlm

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BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D.C. 20554

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FEB 22 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202 )  
FM Table of Allotments )  
Radio Broadcast Stations )  
 )  
(Norway, Michigan) )

To: The Commission

**PETITION FOR RULE MAKING**

Zephyr Broadcasting Inc. (the "Petitioner"), hereby requests that the Commission institute a rule making proceeding to amend Section 73.202 of the Commission's Rules (the FM Table of Allotments) to substitute Channel 232C3 for Channel 232A at Norway, Michigan, and to modify the license of Station WZNL(FM), Norway, Michigan, to specify operation on the higher class channel in accordance with the provisions of Section 1.420(g)(3) of the Commission's rules.

**PROPOSAL OF THE PETITIONER**

1. The Petitioner is the licensee of Station WZNL, which is licensed to operate on Channel 232A at Norway, Michigan (File No. BLH-900323KC).

2. Attached hereto and included as a part of this proposal as Exhibit A is a computer generated allocation study for Channel 232C3 using the tower site coordinates specified in the license for Station WZNL. The study indicates that Channel 232C3 can be substituted for Channel 232A and can be assigned

with only a minor domestic short-spacing, which can be eliminated through a relocation of the licensed antenna site of Station WZNL. The apparent short-spacing is a 2.83 km short-spacing to first-adjacent channel Station WUPK, Marquette, Michigan. There is adequate land available for the construction of a transmitting facility for Station WZNL which will meet all distance separation requirements to all pertinent facilities, authorizations, applications and assignments, including Station WUPK, as well as place the requisite 70 dBu service over all of Norway, the community of license of Station WZNL.

The attached data base information also reflects an apparent 32.6 km short-spacing with respect to co-channel Station WRJO(FM), Eagle River, Wisconsin. However, Station WRJO was authorized in MM Docket No. 88-313 to move to Channel 233C2. The Commission granted a minor change application to construct new transmitting facilities for Station WRJO on Channel 233C2 in July, 1990 (File No. BPH-900501IA). The licensee of Station WRJO has constructed these facilities, filed a license application to cover the construction permit (File No. BLH-901120KB), and is now operating on Channel 233C2 pursuant to program test authority. The proposed operation of Station WZNL on Channel 232C3 fully complies with all separation requirements to Station WRJO operating on Channel 233C2. If necessary, the modification of the licensee for Station WZNL to reflect the allotment change

requested hereby can be conditioned upon the grant of the pending licensee application for Station WRJO.

3. The Petitioner is a Delaware corporation owned and controlled by citizens of the United States. If this petition is acted upon favorably, Channel 232C3 is assigned to Norway in lieu of Channel 232A as requested, and the license of Station WZNL modified as proposed, the Petitioner will promptly file a minor change application for authorization to construct the improved facilities for Station WZNL.

Respectfully submitted,

**ZEPHYR BROADCASTING INC.**

By   
Brian M. Madden

Leventhal, Senter & Lerman  
2000 K Street, N.W.  
Suite 600  
Washington, D.C. 20006

February 22, 1993

Its Attorney

Four Seasons Communications  
Fairfield, CT

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February 14, 1993

## FM Spacing study

Title: NORWAY UPGRADE  
Channel 232C3 ( 94.3 MHz)  
Database: DW 02/10/93

ORIGINAL

Latitude: 45-47-15  
Longitude: 87-51-52  
Safety zone: 45 km

| Call  | Auth        | Licensee name            | Chan  | ERP-kW | Latitude    | Br-to | Dist. | Req.  |
|---|-------------|--------------------------|-------|--------|-------------|-------|-------|-------|
| City of License   | St          | FCC File no.             | Freq  | EAH-m  | Longitude   | -from | (km)  | (km)  |
| PRM   |             | PROPOSED RULE MAKING     | 229C2 |        | 45-47-48    | 271.0 | 101.4 | 56    |
| THREE LAKES   | WI          | DOC-91-318               | 93.7  |        | 89-10-06    | 90.1  | 45.39 | CLEAR |
| PRM adopted 10/28/91, released 11/07/91   |             |                          |       |        |             |       |       |       |
| WDOR-FM LIC   | DOOR COUNTY | BCG CO INC               | 230C1 | 77     | 44-54-23    | 158.3 | 105.3 | 76    |
| STURGEON BAY  | WI          |                          | 93.9  | 195    | 87-22-15    | 338.7 | 29.29 | CLEAR |
| Affiliated with WMAD(AM)  |             |                          |       |        |             |       |       |       |
| WUPK  | LIC         | IRON RANGE BROADCASTING  | 231A  | 4.49   | 46-30-52    | 20.1  | 86.17 | 89    |
| MARQUETTE   | MI          | BLH-920515KA             | 94.1  | 115    | 87-28-37    | 200.4 | -2.83 | SHORT |
| License Granted 09/30/92 per FCC release #21481 dated 10/05/92; Call Granted 0 4/09/92 per FCC release #180 dated 04/10/92; Ant: Harris FML-2E      |             |                          |       |        |             |       |       |       |
| WZNL  | LIC         | ZEPHYR BROADCASTING INCO | 232A  | 1.30   | 45-47-15    | .0    |       | 142   |
| NORWAY  | MI          | BLH-900323KC             | 94.3  | 153    | 87-51-52    | .0    | -142  | SHORT |
| License Granted 08/14/90 per FCC release #20932 dated 08/21/90; Was WNWY 03/02 /90 per FCC release #129 dated 03/09/90                              |             |                          |       |        |             |       |       |       |
| WRJO  | LIC         | NICOLET BROADCASTING INC | 232A  | 3      | 45-58-38    | 281.6 | 109.4 | 142   |
| EAGLE RIVER   | WI          |                          | 94.3  | 61     | 89-14-52    | 100.6 | -32.6 | SHORT |
| Deletion proposed; ORDERED TO 233C2; Was WERL-FM 04/05/85; Affiliated with WER L(AM)  |             |                          |       |        |             |       |       |       |
| K232BE  | LIC         | MR. ALAN TOWLE           | 232FT |        | 44-53-15    | 235.0 | 172.2 | 142   |
| WAUSAU  | WI          | BLFT-860317TQ            | 94.3  |        | 89-39-07    | 53.8  | 30.15 | CLEAR |
| Translator for WWIB, LADYSMITH, WI  |             |                          |       |        |             |       |       |       |
| WTRV  | ORD         | GRAND TRAVERSE BROADCAST | 232C3 |        | DA 44-50-34 | 122.9 | 190.2 | 153   |
| LELAND  | MI          |                          | 94.3  |        | 85-50-33    | 304.3 | 37.16 | CLEAR |
| DOC-89-374; ORDERED FROM 232A; Was WLEL 08/07/91 per FCC release #164 dated 08 /09/91   |             |                          |       |        |             |       |       |       |
| WROE  | CP          | FOX VALLEY BROADCASTING, | 232C3 | 25DA   | 44-07-10    | 194.7 | 191.5 | 153   |
| NEENAH-MENASHA  | WI          | BPH-920625IC             | 94.3  | 100    | 88-28-24    | 14.3  | 38.50 | CLEAR |
| DOC-91-132; CP Granted 10/28/92 per FCC release #21504 dated 11/05/92; ORDERED FROM 232A; Affiliated with WHBY(AM)                                  |             |                          |       |        |             |       |       |       |
| WRJO  | CP          | NICOLET BROADCASTING INC | 233C2 | 50     | 46-09-57    | 290.5 | 123.7 | 117   |
| EAGLE RIVER   | WI          | BPH-900501IA             | 94.5  | 150    | 89-21-57    | 109.4 | 6.720 | CLOSE |
| CP Granted 07/12/90 per FCC release #20909 dated 07/25/90; ORDERED FROM 232A; Was WERL-FM 04/05/85; Ant: BESP-6AE; TX: Andrew HJ8-50B               |             |                          |       |        |             |       |       |       |
| WCMM  | LIC         | WSHN, INC.               | 234C1 | 100    | 45-58-01    | 78.9  | 108.7 | 76    |
| GULLIVER  | MI          | BLH-920228KC             | 94.7  | 248    | 86-29-18    | 259.9 | 32.68 | CLEAR |
| License Granted 08/10/92 per FCC release #21445 dated 08/13/92; Was WTIQ-FM 02 /21/92 per FCC release #176 dated 02/14/92; Affiliated with WTIQ(AM) |             |                          |       |        |             |       |       |       |

Four Seasons Communications  
Fairfield, CT

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FM Spacing study

Title: NORWAY UPGRADE  
Channel 232C3 ( 94.3 MHz)

Latitude: 45-47-15  
Longitude: 87-51-52

| Call<br>City of License                     | Auth Licensee name<br>St     | FCC File no. | Chan<br>Freq | ERP-kW<br>EAH-m | Latitude<br>Longitude | Br-to<br>-from | Dist.<br>(km) | Req.<br>(km) |
|---|------------------------------|--------------|--------------|-----------------|-----------------------|----------------|---------------|--------------|
| ALLOC                                       | MINIMUM OF 75. KW + 500      |              | 234C         |                 | 45-57-24              | 80.9           | 127.0         | 96           |
| MANISTIQUE                                  | MI                           |              | 94.7         |                 | 86-14-48              | 262.0          | 31.01         | CLEAR        |
| Allocated to GULLIVER MI                    |                              |              |              |                 |                       |                |               |              |
| WKZC  | ORD WEST SHORE BROADCASTING  |              | 235C3        | 17              | 44-03-27              | 148.8          | 223.7         | 43           |
| SCOTTVILLE                                  | MI BPH-921123IC              |              | 94.9         | 122             | 86-24-58              | 329.9          | 180.7         | CLEAR        |
| DOC-89-385; ORDERED FROM 240A; TDF          |                              |              |              |                 |                       |                |               |              |
| WKFX  | LIC WINCOM WISCONSIN LIMITED |              | 285A         | 1.35            | 44-15-28              | 188.8          | 172.0         | 12           |
| KAUKAUNA                                    | WI                           |              | 104.9        | 146             | 88-11-43              | 8.6            | 160.0         | CLEAR        |
| Was WKAU 01/01/87                           |                              |              |              |                 |                       |                |               |              |
| WGFM  | LIC REYNOLDS COMMUNICATIONS  |              | 286C1        | 100             | 45-26-50              | 97.0           | 267.1         | 24           |
| CHEBOYGAN                                   | MI BLH-850312LP              |              | 105.1        | 186             | 84-28-30              | 279.4          | 243.1         | CLEAR        |
| Was WQLZ 01/08/89; Affiliated with WCBY(AM) |                              |              |              |                 |                       |                |               |              |

>> End of channel 232C3 study <<

FM Spacing study

Title: NORWAY UPGRADE  
Channel 232C3 ( 94.3 MHz)  
Database: FCC 12/29/92

Latitude: 45-47-15  
Longitude: 87-51-52  
Safety zone: 45 km

| Call                                    | Auth | Licensee name            | Chan  | ERP-kW | Latitude  | Br-to | Dist. | Req.  |
|---|------|--------------------------|-------|--------|-----------|-------|-------|-------|
| City of License                         | St   | FCC File no.             | Freq  | EAH-m  | Longitude | -from | (km)  | (km)  |
| PRM                                     | ADD  | Three Lakes Broadcasting | 229C3 |        | 45-54-50  | 278.8 | 96.44 | 43    |
| Three Lakes                             | WI   | DOC-91-318               | 93.7  |        | 89-05-34  | 98.0  | 53.44 | CLEAR |
| ALLOC                                   |      |                          | 230C1 |        | 44-54-23  | 158.3 | 105.3 | 76    |
| Sturgeon Bay                            | WI   |                          | 93.9  |        | 87-22-15  | 338.7 | 29.29 | CLEAR |
| WDOR-FM LIC                             |      | Door County Broadcasting | 230C1 | 77     | 44-54-23  | 158.3 | 105.3 | 76    |
| Sturgeon Bay                            | WI   | BLH-801224AK             | 93.9  | 198    | 87-22-15  | 338.7 | 29.29 | CLEAR |
| WUPK                                    | LIC  | Iron Range Broadcasting  | 231A  | 4.50   | 46-30-52  | 20.1  | 86.17 | 89    |
| Marquette                               | MI   | BLH-920515KA             | 94.1  | 115    | 87-28-37  | 200.4 | -2.83 | SHORT |
| ALLOC                                   |      |                          | 231A  |        | 46-33-00  | 23.0  | 92.23 | 89    |
| Marquette                               | MI   | DOC-90-567               | 94.1  |        | 87-23-36  | 203.3 | 3.234 | CLOSE |
| Filing window 04/15-05/15/91 **CLOSED** |      |                          |       |        |           |       |       |       |
| WZNL                                    | LIC  | Zephyr Broadcasting, Inc | 232A  | 1.30   | 45-47-15  | .0    |       | 142   |
| Norway                                  | MI   | BLH-900925KA             | 94.3  | 153    | 87-51-52  | .0    | -142  | SHORT |
| ALLOC                                   |      |                          | 232A  |        | 45-47-18  | 271.5 | 3.544 | 142   |
| Norway                                  | MI   | DOC-83-1134              | 94.3  |        | 87-54-36  | 91.5  | -138  | SHORT |
| Filing window 06/13-07/12/85 **CLOSED** |      |                          |       |        |           |       |       |       |
| WRJO                                    | LIC  | Nicolet Broadcasting, In | 232A  | 3      | 45-58-38  | 281.6 | 109.4 | 142   |
| Eagle River                             | WI   | BLH-5192                 | 94.3  | 61     | 89-14-52  | 100.6 | -32.6 | SHORT |
| ALLOC                                   |      |                          | 232C3 |        | 44-19-00  | 198.5 | 172.1 | 153   |
| Neenah-Menasha                          | WI   | DOC-91-132               | 94.3  |        | 88-33-00  | 18.0  | 19.15 | CLEAR |
| K232BE                                  | LIC  | MR. Alan Towle           | 232FT |        | 44-53-15  | 235.0 | 172.2 | 142   |
| Wausau                                  | WI   | BLFT-860317TQ            | 94.3  |        | 89-39-07  | 53.8  | 30.15 | CLEAR |
| ALLOC                                   |      |                          | 232C3 |        | 44-51-40  | 123.5 | 183.6 | 153   |
| Leland                                  | MI   | DOC-89-374               | 94.3  |        | 85-55-30  | 304.9 | 30.63 | CLEAR |
| WROE                                    | CP   | Fox Valley Broadcasting, | 232C3 | 25DA   | 44-07-10  | 194.7 | 191.5 | 153   |
| Neenah-Menasha                          | WI   | BPH-920625IC             | 94.3  | 100    | 88-28-24  | 14.3  | 38.50 | CLEAR |
| DA: oddball ODD920625IC @ 0 deg         |      |                          |       |        |           |       |       |       |
| WRJO                                    | CP   | Nicolet Broadcasting, In | 233C2 | 50     | 46-09-57  | 290.5 | 123.7 | 117   |
| Eagle River                             | WI   | BPH-900501IA             | 94.5  | 150    | 89-21-57  | 109.4 | 6.720 | CLOSE |
| ALLOC                                   |      |                          | 233C2 |        | 46-09-57  | 290.5 | 123.7 | 117   |
| Eagle River                             | WI   | DOC-88-313               | 94.5  |        | 89-21-57  | 109.4 | 6.720 | CLOSE |
| WCMM                                    | APC  | WSHN, Inc.               | 234C1 | 100    | 45-58-01  | 78.9  | 108.7 | 76    |
| Gulliver                                | MI   | BMPH-901220IA            | 94.7  | 248    | 86-29-18  | 259.9 | 32.68 | CLEAR |

Four Seasons Communications  
Fairfield, CT

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FM Spacing study

Title: NORWAY UPGRADE  
Channel 232C3 ( 94.3 MHz)

Latitude: 45-47-15  
Longitude: 87-51-52

| Call       | Auth    | Licensee name | Chan            | ERP-kW | Latitude | Br-to     | Dist. | Req.        |
|------------|---------|---------------|-----------------|--------|----------|-----------|-------|-------------|
| City of    | License | St            | FCC File no.    | Freq   | EAH-m    | Longitude | -from | (km) (km)   |
| ALLO       |         |               | 235C3           |        |          | 44-04-40  | 148.5 | 221.7 43    |
| Scottville |         | MI            | DOC-89-385      | 94.9   |          | 86-25-00  | 329.6 | 178.7 CLEAR |
| WKFX       | LIC     | Wincom WI     | Limited Partne  | 285A   | 1.35     | 44-15-28  | 188.8 | 172.0 12    |
| Kaukauna   |         | WI            | BLH-850426KS    | 104.9  | 146      | 88-11-43  | 8.6   | 160.0 CLEAR |
| WGFM       | LIC     | Reynolds      | Communications, | 286C1  | 100      | 45-26-50  | 97.0  | 267.1 24    |
| Cheboygan  |         | MI            | BLH-850312LP    | 105.1  | 186      | 84-28-30  | 279.4 | 243.1 CLEAR |

>> End of channel 232C3 study <<